

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA

*In re EQT Corporation Securities Litigation*

Case No. 2:19-cv-00754-RJC

**PLAINTIFFS' MOTION TO EXCLUDE PORTIONS OF THE EXPERT REPORTS AND  
TESTIMONY OF DR. KENNETH M. LEHN**

Lead Plaintiffs and Class Representatives Government of Guam Retirement Fund (“Guam”), Eastern Atlantic States Carpenters Annuity Fund and the Eastern Atlantic States Carpenters Pension Fund (collectively “Eastern Atlantic Carpenters”), and additional Plaintiff and Class Representative Cambridge Retirement System (“Cambridge”) (collectively “Plaintiffs”) respectfully move the Court to exclude portions of the expert reports and testimony submitted by Dr. Kenneth M. Lehn. The factual and legal grounds for the relief sought are set forth in the accompanying Memorandum of Law in Support of Plaintiffs’ Motion to Exclude Portions of the Expert Reports and Testimony of Dr. Kenneth M. Lehn.

A proposed order setting forth the specific relief requested is attached hereto as Exhibit A.

Dated: August 29, 2024

Respectfully submitted,

By: /s/ Adam H. Wierzbowski

Adam H. Wierzbowski (NY Bar No. 4203675;  
admitted *pro hac vice*)

**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**

Salvatore J. Graziano (admitted *pro hac vice*)  
Adam H. Wierzbowski (admitted *pro hac vice*)  
Jesse L. Jensen (admitted *pro hac vice*)  
Robert F. Kravetz (PA I.D. #91168)  
Jai K. Chandrasekhar (admitted *pro hac vice*)  
Shane D. Avidan (admitted *pro hac vice*)  
Thomas Sperber (admitted *pro hac vice*)  
1251 Avenue of the Americas  
New York, New York 10020  
Tel: (212) 554-1400  
Fax: (212) 554-1444

salvatore@blbglaw.com  
adam@blbglaw.com  
jesse.jensen@blbglaw.com  
robert.kravetz@blbglaw.com  
jai@blbglaw.com  
shane.avidan@blbglaw.com  
thomas.sperber@blbglaw.com

**COHEN MILSTEIN SELLERS  
& TOLL PLLC**

Steven J. Toll (admitted *pro hac vice*)  
Daniel S. Sommers (admitted *pro hac vice*)  
S. Douglas Bunch (admitted *pro hac vice*)  
1100 New York Avenue, N.W., Suite 500  
Washington, D.C. 20005  
Tel: (202) 408-4600  
Fax: (202) 408-4699  
stoll@cohenmilstein.com  
dsommers@cohenmilstein.com  
dbunch@cohenmilstein.com

Christina D. Saler (admitted *pro hac vice*)  
100 N. 18th Street, Suite 1820  
Philadelphia, PA 19103  
Tel: (267) 479-5707  
Fax: (267) 479-5701  
csaler@cohenmilstein.com

Benjamin F. Jackson (admitted *pro hac vice*)  
Alexandra Gray (admitted *pro hac vice*)  
88 Pine St., 14th Floor  
New York, NY 10005  
Tel: (212) 838-7797  
Fax: (212) 838-7745  
bjackson@cohenmilstein.com  
agray@cohenmilstein.com

*Co-Lead Counsel for Lead Plaintiffs and the Class*

**COMBER MILLER LLC**

Michael A. Comber (PA I.D. #81951)  
436 Seventh Avenue  
Pittsburgh, PA 15219  
Tel: (412) 894-1380  
Fax: (412) 291-2109  
mcomber@reisingercomber.com

*Liaison Counsel for Lead Plaintiffs and the Class*

**CERTIFICATE OF SERVICE**

I, Adam H. Wierzbowski, hereby certify that on August 29, 2024, I caused a true and correct copy of the foregoing to be filed electronically with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's CM/ECF automated filing system.

/s/ Adam H. Wierzbowski  
Adam H. Wierzbowski